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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Cabanillas & Associates, PC Paola D. Vera, Esq. 120 Bloomingdale Rd., Suite 400 White Plains, NY 10605 914-385-0292

In Re:

Case No.: 18-23886-RG

Luz M. Villafane,

Debtor(s).

Chapter: 13

Judge: Rosemary Gambardella

DEBTOR'S OPPOSITION TO CERTIFICATION OF DEFAULT FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. 362(d)

The above named debtor, by and through her attorney of record, Paola D. Vera, Esq. of Cabanillas & Associates, P.C., hereby opposes Specialized Loan Servicing's Certification of Default, and in support thereof presents the Certification of Paola D. Vera, Esq. and shows unto the Court the following:

- 1. On July 11, 2018 the debtor filed a voluntary Chapter 13 petition with the clerk of this court.
- On March 29, 2019 Specialized Loan Servicing filed a motion seeking relief from the Automatic stay in regards to 108 Linnet St Bayonne, NJ 07002.
 - 3. An order curing Post-Petition Arrears resolving Motion for Relief from Stay was entered on May 7, 2019.
 - 4. On September 27, 2019 creditor filed a Certification of Default stating the debtor has not made payments for August 2019 and September 2019.

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5. The debtor is current through September 2019, receipts for payments have been attached hereto as "Exhibit A".

6. Therefore the Debtor respectfully requests that she be given the opportunity to cure all post-petition arears.

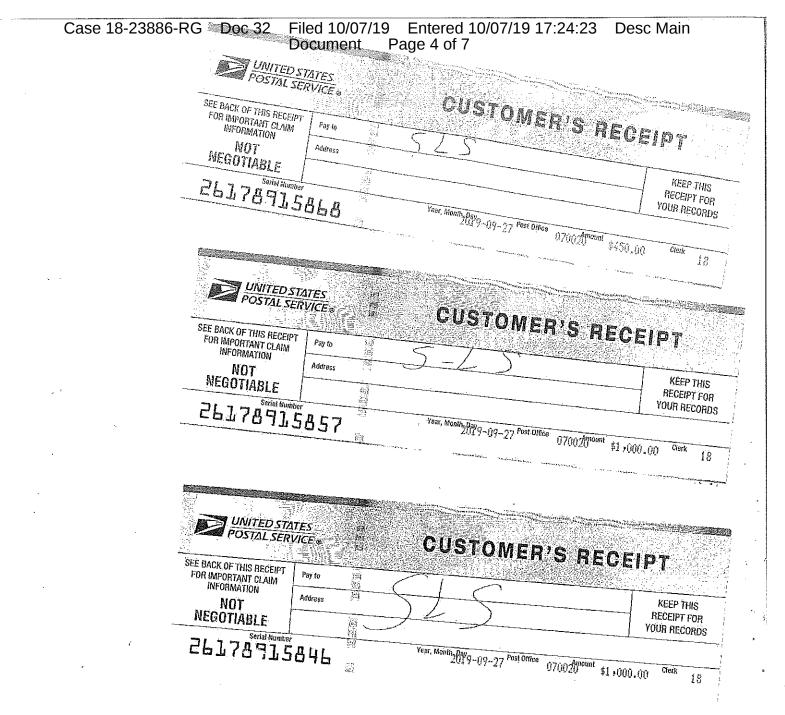
WHEREFORE, the debtor respectfully requests that the instant Motion be denied; and the debtor be granted such other and further relief as this Court deems proper.

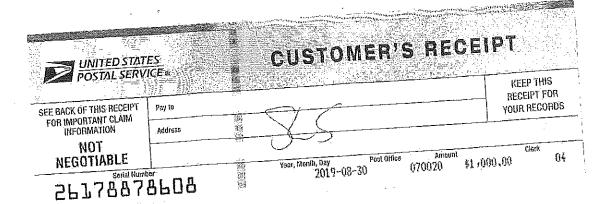
Dated: Union City, New Jersey October 7, 2019

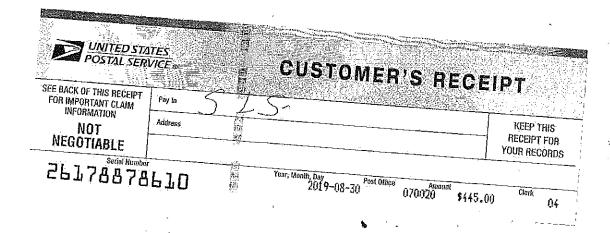
CABANILLAS & ASSOCIATES, PC

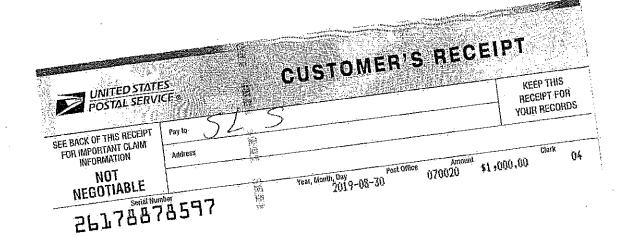
/s/Paola D. Vera Paola D. Vera, Esq. 4100 Kennedy Blvd Union City, New Jersey 07087

EXHIBIT









| | TED STATES BANKRUPTCY COURT TRICT OF NEW JERSEY | | | |
|----------|--|---------------------|----------------------|--|
| Capti | on in Compliance with D.N.J. LBR 9004-1(b) | | | |
| Cab: 120 | a D. Vera anillas & Associates PC Bloomingdale Rd., Ste 400 te Plains, NY 10605 | | | |
| | | Case No.: | 18-12775-RG | |
| | | Chapter: | 13 | |
| In R | e: M. Villafane | Adv. No.: | | |
| | | Judge: | Rosemary Gambardella | |
| 1 Y N | CERTIFICATION | OF SERVICE | | |
| i. 1, i | Viobi L. Soler: ☐ representin this matter. | | | |
| | | | | |
| | am thein this case and am represe | nting myself. | | |
| 2. | On 10/7/19 I sent a copy of the following pleadings and/or documents to the parties listed in the chart below. Opposition to Certification of Default | | | |
| | Upposition 12 continue | ~ c((or) | | |
| 3. | I certify under penalty of perjury that the above documents were sent using the mode of service indicated. | | | |
| Date: | 10/7/19 | Must L Signature | Saler | |

| Name and Address of Party Served | Relationship of Party to the Case | Mode of Service |
|---|--|--|
| Luz M Villafane | Debtor | ☐ Hand-delivered |
| 108 Linnett St. Bayonne, NJ 07002 | | ☐ Regular mail |
| 20, 0,20, 2,00 0, 002 | | ☐ Certified mail/RR |
| | | Other (As authorized by the Court or by rule. Cite the rule if applicable.) |
| Marie-Ann Greenberg | Trustee | ☐ Hand-delivered |
| 30 Two Bridges Road; Suite 330 | | ⊠ Regular mail |
| Fairfield, NJ 07004 | | ☐ Certified mail/RR |
| | | Other (As authorized by the Court or by rule. Cite the rule if applicable.) |
| KML Law Group, P.C. | Attorney for Creditor | ☐ Hand-delivered |
| Attn Denise Carlon | | │ ⊠ Regular mail |
| 216 Haddon Avenue, Ste. 406 Westmont, NJ 08108 | | ☐ Certified mail/RR |
| Westmone, 140 oor oo | | Other (As authorized by the Court or by rule. Cite the rule if applicable.) |
| Specialized Loan Servicing | Creditor | ☐ Hand-delivered |
| 8742 Lucent Blvd. Ste. 300 | | ⊠ Regular mail |
| Littleton, CO 80129 Attn: Authorized Agent | | ☐ Certified mail/RR |
| The portor of the party | | ☐ Other |
| | | (As authorized by the Court or by rule. Cite the rule if applicable.) |
| | | ☐ Hand-delivered |
| | | ☐ Regular mail |
| | | ☐ Certified mail/RR |
| | The state of the s | ☐ Other |
| | | (As authorized by the Court or by rule, Cite the rule if applicable.) |